IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

United Resource Recovery)	
Corporation,)	
)	
Plaintiff,)	
)	PLAINTIFF'S ANSWERS TO
-VS-)	LOCAL RULE 26.01 INTERROGATORIES
)	
RamKo Venture Management,)	
Inc., and John Kohut,)	
)	
Defendants.)	

COMES NOW, Plaintiff, United Resource Recovery Corporation, and in response to the Court's Interrogatories, responds as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Not applicable.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: This is a declaratory judgment action and should be tried non-jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

The Plaintiff is not a publicly traded company nor is it **RESPONSE:** affiliated with a publicly traded company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

RESPONSE: The Plaintiff's principal place of business is in this division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases; arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Not applicable. **RESPONSE:**

February 20, 2007 s/Thomas M. Larkin

Michael J. Giese (#2094)

Thomas M. Larkin (#9480)

Leatherwood Walker Todd & Mann, P.C.

300 East McBee Avenue, Suite 500 (29601)

Post Office Box 87

Greenville, SC 29602

(864) 242-6440

(864) 240-2475

mgiese@lwtm.com

tlarkin@lwtm.com

ATTORNEYS FOR PLAINTIFF

1070953